

9:42 am, Feb 28 2024

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(Northern Division)AT BALTIMORE
CLERK, U.S. DISTRICT COURT
DISTRICT OF MARYLAND
BY _____ Deputy

DAVID J. BOSHEA,

*

v.

*

Civil Action No. 1:21-cv-00309-ELH

COMPASS MARKETING, INC.

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COMPASS MARKETING, INC.'S EXHIBITS

Exhibit No.	Identification	Admitted	Description
1	2b1/24	2/21/24	March 2, 2020 David Boshea Termination Letter & Proposed Severance Agreement
2			May 24, 2007 Email from David Boshea to Michael White Re: Follow Up
3			June 12, 2007 Salary Reduction Form for David Boshea January 1, 2007 through December 31, 2007 (Redacted)
4			Maryland New Hire Registry Reporting Form (Redacted)
5			Illinois Withholding Allowance Worksheet (Redacted)
6	2/26/24	2/26/24	March 5, 2020 Email from Rebecca Obarski to John White Re: David Boshea Employment Terms
7			March 5, 2020 Email from Rebecca Obarski to Erin Songer Re: Personnel File of David Boshea

David J. Boshea v. Compass Marketing, Inc.
 Civil Action No. 1:21-cv-00309-ELH
 Defendant's Exhibits

Exhibit No.	Identification	Admitted	Description
8	2/21/24	2/21/24	August 11, 2020 Email from David Boshea to John White FW: Compass Separation
9	2/21/24	2/21/24	May 29, 2020 Email from David Boshea to John White FW: Dave Boshea Employment Terms
10			June 11, 2020 Email from David Boshea to John White Re: Loser
11			August 1, 2020 Email from David Boshea to John White (No subject)
12			August 11, 2020 Email from David Boshea to John White FW: Dave Boshea Employment Terms
13			REMOVED
14			David Boshea Call Log
15	2/23/24	2/23/24	October 31, 2021 John D. White Signature Examination by Jeffrey Payne
16	2/23/24	2/23/24	October 31, 2021 Rebuttal of the Findings of Donna O. Eisenberg by Jeffrey Payne
17	2/23/24	2/23/24	Jeffrey Payne Testimony as of January 2024
18			January 4, 2021 Text between David Boshea, Daniel White, and Michael White
19			REMOVED

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Defendant's Exhibits

Exhibit No.	Identification	Admitted	Description
20	2/22/24	2/22/24	June 7, 2021 Email from David Boshea to Daniel White Re: Contracts
21	2/22/24	2/22/24	June 16, 2021 Email from David Boshea to Daniel White (Untitled)
22			September 17, 2021 Email from Gregory Jordan to Michael White Re: John White Signature Samples
23	2/21/24	2/21/24	December 28, 2020 Text Messages between David Boshea and Michael White
24			September 16, 2021 Text Message between David Boshea, Michael White, and Daniel White (Redacted)
25			January 12, 2021 Email from Daniel White to Gregory Jordan Re: David Boshea
26	2/21/24	2/21/24	December 27, 2020 Email from David Boshea to Gregory Jordan and Daniel White Re: Compass
27			David Boshea's Responses to Defendant Compass Marketing Inc.'s First Set of Interrogatories to Plaintiff David J. Boshea (Redacted)
28	2/21/24		David Boshea's Amended Responses to Defendant Compass Marketing's First Set of Interrogatories to Plaintiff David J. Boshea (Redacted)

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Defendant's Exhibits

Exhibit No.	Identification	Admitted	Description
29	2/21/24	2/21/24	December 27, 2020 Email from David Boshea to Daniel White Re: Greg
30			REMOVED
31	2/21/24	2/21/24	Compass Marketing, Inc. Agreement Relating to Employment and Post-Employment Competition (Unexecuted) (Nagle, Obarski & Holzhauer, P.C.)
32			Compass Marketing, Inc. Agreement Relating to Employment and Post-Employment Competition (Executed)
33			September 17, 2021 Email from Daniel White to Gregory Jordan
34			September 13, 2021 Email from Gregory Jordan to Daniel White Re: Boshea v. Compass Marketing, Inc. - Compass Marketing's Expert Disclosure
35			August 15, 2021 Email from Gregory Jordan to Daniel White Re: Dan Mike
36			January 15, 2021 Email from Gregory Jordan to Daniel White Re: Local Counsel Referral
37			December 23, 2020 Email from Gregory Jordan to Daniel White Re: Follow Up

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Defendant's Exhibits

Exhibit No.	Identification	Admitted	Description
38			September 20, 2021 Email from Gregory Jordan to Michael White Re: Documents
39			Compass Marketing, Inc Agreement Relating to Employment and Post-Employment Competition (revision 1)
40			Compass Marketing, Inc Agreement Relating to Employment and Post-Employment Competition
41			Compass Marketing, Inc Agreement Relating to Employment and Post-Employment Competition
42			June 3, 2021 Email from David Boshea to Daniel White FW: Compass Marketing Severance Agreement
43	2b1/24	2b1/24	January 5, 2021 Email from David Boshea to Daniel White and Michael White (No subject)
44			January 7, 2021 Email from David Boshea to Daniel White Re: Compass
45			December 21, 2020 Email from Daniel White to David Boshea Re: Follow Up
46			REMOVED
47			June 16, 2021 Email from David Boshea to Daniel White (No subject)

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Defendant's Exhibits

Exhibit No.	Identification	Admitted	Description
48			REMOVED
49			June 29, 2021 Email from David Boshea to Daniel White FW: 1:21-cv-00309-ELH Boshea v. Compass Marketing, Inc.
50			REMOVED
51			June 27, 2023 Email from David Boshea to Michael White and Gregory Jordan (No subject)
52	2/22/24 2/22/24		September 12, 2023 Email from David Boshea to Michael White and Daniel White Re: revision trial prep
53	2/22/24 2/22/24		October 6, 2023 Email from Michael White to David Boshea (No subject)
54	2/22/24 2/22/24		September 18, 2023 Text Message from David Boshea to Michael White
55			REMOVED
56			October 5, 2021 Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action to John Adams
57			REMOVED
58			REMOVED
59			REMOVED

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Defendant's Exhibits

Exhibit No.	Identification	Admitted	Description
60			REMOVED
61			January 26, 2021 Email from D. Boshea to Daniel White FW: Document
62	2/21/24		April 2007 David Boshea Memo to John White
63			REMOVED
64			REMOVED
65			REMOVED
66			REMOVED
67			REMOVED
68	2/21/24		Affidavit of David J. Boshea in Support of His Response in Opposition to Compass Marketing, Inc.'s Motion for Partial Summary Judgment
69			REMOVED
70			REMOVED
71			REMOVED